

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

QUAN-EN YANG

Plaintiff

vs.

G&C GULF, INC., D/B/A G&G TOWING

Defendant

CIVIL ACTION NO.: 403885V

ANSWER TO COMPLAINT

Your Defendant, G&C Gulf, Inc., d/b/a G&G Towing, by and through counsel, in answer to the Complaint filed herein states as follows:

FIRST DEFENSE

Pursuant to Maryland Rule 2-323(d), Defendant generally denies liability for any and all of the causes of action pled.

SECOND DEFENSE

Plaintiff's Complaint fails to set forth a cause of action for which relief may be granted.

THIRD DEFENSE

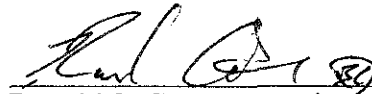
Plaintiff's claims under the Montgomery County Code are barred because state law precludes the local laws upon which Plaintiff's causes of action are based.

FOURTH DEFENSE

Plaintiff has failed to mitigate his damages in this case.

WHEREFORE, your Defendant prays that this Honorable Court dismiss this matter and award Defendant all of its costs and expenses.

THE LAW OFFICES OF RONALD S. CANTER, LLC



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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the foregoing was served upon the individual(s) listed below by First Class Mail, postage prepaid on this 8th day of July, 2015 to:

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